



Lancaster County
CONSERVANCY
Protecting natural places for people & wildlife

EI-791
CD

April 27, 2004

Mr. Troy Brady
Surface Transportation Board
Section of Environmental Analysis
1925 K Street, NW, Suite 500
Washington, DC 20423-0001

Re: Final Memorandum of Agreement
Enola Low Grade Line
Ref. Docket No. AB-167(1095X), Consolidated Rail Corp.

Dear Mr. Brady,

We have received your document as referenced above, dated April 12, 2004 and understand that you have asked that we, as a concurring party, sign off on the document and the Section 106 consultation process. After review of the documents and recommendations, we have elected not to sign the Memorandum of Agreement for the following reasons:

1. The document states that the entire Enola Branch was determined to be historic by the Keeper of the National Register of Historic Places. We believe that it is inconsistent for the line to be broken into individual parts as part of the value exists in its continuity through the southern portion of Lancaster County. Because the recommendation would clear the way for Norfolk Southern to divide up the line among the townships and borough, we object to any agreement that allows this to occur.
2. The possibility of a recreational trail along the length of this line, as well as rail banking this contiguous line for the future for transportation as well as other economic benefits should outweigh any agreement that could result in these lands being placed in private ownership or use. Such a scenario is possible if each municipality is allowed to independently and freely decide the future of their section of the line.
3. The Lancaster County Commissioners have offered an acceptable and attractive alternative and are willing to commit the necessary resources to improve the current poor conditions on the line and create a multi-purpose trail for the public benefit. We believe that Norfolk Southern has not given adequate consideration of this proposal by the County and should be required to do so.



4. A number of the communities along this line have asked the County to step in and take control and responsibility for this line. The County has more resources to bring to bear and we are concerned that individually, the townships and borough can't muster the resources and political will to improve this line, manage the property, and protect adjacent property owners. As a property owner along the line, the Conservancy is eager for the townships to work with the County, sharing responsibility and resources. Currently there is not such plan or agreement in place.

By signing this Agreement, the Conservancy's Board of Directors and membership, more than 2,500 strong, feel that we would be supporting the break up of this line. We believe that such a result is not in the best public interest. This line represents about 800 acres of primarily wooded ground, some of which is ground worth protecting for wildlife and public recreation. The Conservancy's mission is the protection of natural lands and open space for the health of the ecosystem, the enjoyment of the public, and for the benefit of Lancaster County. There can be no greater benefit than to see this line maintained as a continuous trail for public recreation and for its lands to be managed for wildlife and people.

Sincerely,

A handwritten signature in black ink, appearing to read "Ralph H. Goodno". The signature is fluid and cursive, with a large loop at the end.

Ralph H. Goodno
President & CEO

Cc: Lancaster County Commissioners
PA – DCNR Richard Sprenkle, Larry Williamson
LCC Board Chair – Margaret Stouffer